

**Remarks**

This Application has been carefully reviewed in light of the Final Office Action mailed September 8, 2004. Applicant believes all claims are allowable without amendment. No claims have been amended. However, Applicant respectfully provides these remarks. Applicant respectfully requests reconsideration and allowance of all pending claims.

**The Claims are Allowable over *Chow* and *Wimble***

The Examiner rejects Claims 1-56 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,226,693 to Chow et al. ("*Chow*") and further in view of U.S. Patent 5,778,230 to Wimble et al. ("*Wimble*"). Applicant respectfully disagrees.

**Independent Claims 1, 9, 13, and 19**

*Chow*, *Wimble*, and even the *Chow-Wimble* combination proposed by the Examiner fail to disclose, teach, or suggest various limitations recited in independent Claim 1.

First, *Chow*, *Wimble*, and the proposed *Chow-Wimble* combination fail to disclose, teach, or suggest a system for managing event publication and subscription for event producer-consumers of heterogeneous types using a plurality of mappers each specific to a particular type of event producer-consumer, as recited in independent Claim 1.

In the Final Office Action, the Examiner argues that Column 9, Lines 16-19 of *Chow* provides such teaching:

As to applicant's argument *Chow* disclosed the objects can register actions for a specific logical event on a given target object with event manager. These actions can be procedure/method calls or scripts. Events are designed in an object oriented fashion and the user can subclass the abstract action object and create new custom objects (col. 9, lines 16-19).

(Final Office Action, Page 10)

As discussed in a previous Response, even assuming for the sake of argument that the Examiner's summary of Column 9, Lines 16-19 of *Chow* is accurate, that portion of *Chow*, and all other portions of *Chow*, would still fail to disclose, teach, or suggest a system for managing event publication and subscription for event producer-consumers of heterogeneous

types using a plurality of mappers each specific to a particular type of event producer-consumer, as recited in independent Claim 1.

Moreover, the Examiner admits in the Final Office Action that *Chow* fails to fully disclose that a “physical event manager comprises: a first mapper specific to the first type of the first event producer-consumer and operable to translate between the logical event manager and the first event producer-consumer; and a second mapper specific to the second type of the second event producer-consumer and operable to translate between the logical event manager and the second event producer-consumer.” (See Final Office Action, Pages 2-3) Accordingly, it would seem that even the Examiner would admit that *Chow* fails to disclose, teach, or suggest a system for managing event publication and subscription for event producer-consumers of heterogeneous types using a plurality of mappers each specific to a particular type of event producer-consumer, as recited in independent Claim 1. Thus, *Chow* is wholly inadequate as a reference against Claim 1.

Furthermore, as discussed in a previous Response, *Wimble* fails to make up for the clear deficiencies of *Chow*. *Wimble* discloses a debugging system that includes a Logical to Physical Manager that maps a physical event into a set of logical events. (Abstract; Column 1, Lines 15-18; Column 10, Line 63-Column 11, Line 2; Column 11, Lines 24-29; Column 12, Lines 46-51) However, *Wimble* fails to disclose, teach, or suggest a system for managing event publication and subscription for event producer-consumers of heterogeneous types using a plurality of mappers each specific to a particular type of event producer-consumer, as recited in independent Claim 1. Thus, *Wimble* is also wholly inadequate as a reference against Claim 1.

Consequently, even assuming for the sake of argument that there was the required teaching, suggestion, or motivation to combine *Chow* with *Wimble* in the manner the Examiner proposes, the proposed *Chow-Wimble* combination would still fail to disclose, teach, or suggest a system for managing event publication and subscription for event producer-consumers of heterogeneous types using a plurality of mappers each specific to a particular type of event producer-consumer, as recited in independent Claim 1.

Second, *Chow*, *Wimble*, and the *Chow-Wimble* combination proposed by the Examiner fail to disclose, teach, or suggest that a physical event manager that is in communication with a logical event manager, and that comprises “a first mapper specific to the first type of the first event producer-consumer and operable to translate between the logical event manager and the first event producer-consumer” and “a second mapper specific to the second type of the second event producer-consumer and operable to translate between the logical event manager and the second event producer-consumer,” where the first and the second event producer-consumers are of heterogeneous types as recited in independent Claim 1.

As discussed above, the Examiner admits in the Final Office Action that *Chow* fails to fully disclose a “physical event manager comprises: a first mapper specific to the first type of the first event producer-consumer and operable to translate between the logical event manager and the first event producer-consumer; and a second mapper specific to the second type of the second event producer-consumer and operable to translate between the logical event manager and the second event producer-consumer.” (See Final Office Action, Pages 2-3) Thus, *Chow* is wholly inadequate as a reference against Claim 1.

In the Final Office Action, the Examiner argues that Column 10, Lines 63-67 and Column 11, Lines 1-2 of *Wimble* provides such teaching.

As to applicant's argument *Wimble* disclosed each time a primitive physical event is detected, the state manager uses the logical to physical manager to map the physical event into a set of logical events (col. 12, lines 40-54). ... The logical to physical Manager 158 is responsible for managing the bi-directional mapping between multiple logical primitive events and a unique physical event (col. 10, lines 63-67 and col. 11, lines 1-2).

(Final Office Action, Page 11)

Applicant respectfully disagrees. As clearly illustrated in Figure 13, *Wimble* merely discloses a Logical to Physical Manager that is in communication with a single primitive event object and thus performs only one type of mapping for the single primitive event object. (See Column 10, Lines 43-44) *Wimble* even fails to disclose, teach, or suggest heterogeneous types of event producer-consumers. Accordingly, *Wimble* has absolutely no

need for a first mapper and a second mapper each specific to a different type of event producer-consumer as recited in independent Claim 1. Thus, *Wimble* is also wholly inadequate as a reference against Claim 1.

Consequently, even assuming for the sake of argument that there was the required teaching, suggestion, or motivation to combine *Chow* with *Wimble* in the manner the Examiner proposes, the proposed *Chow-Wimble* combination would still fail to disclose, teach, or suggest a physical event manager that is in communication with a logical event manager, and that comprises “a first mapper specific to the first type of the first event producer-consumer and operable to translate between the logical event manager and the first event producer-consumer” and “a second mapper specific to the second type of the second event producer-consumer and operable to translate between the logical event manager and the second event producer-consumer,” where the first and the second event producer-consumers are of heterogeneous types as recited in independent Claim 1.

Accordingly, even assuming for the sake of argument that there was the required teaching, suggestion, or motivation to combine *Chow* with *Wimble* in the manner the Examiner proposes, the proposed *Chow-Wimble* combination would still fail to disclose, teach, or suggest the limitations specifically recited in independent Claim 1.

Furthermore, the references relied upon by the Examiner fail to provide any teaching, suggestion, or motivation to modify *Chow* by combining *Chow* with *Wimble* or to otherwise combine the reference as proposed by the Examiner.

As discussed in a previous Response, the Examiner's conclusions that the proposed combination would “increase the functionality of the system” and “make the user more independent” are entirely insufficient in light of the strict M.P.E.P. and Federal Circuit guidelines discussed at length in that Response. As discussed above, as clearly illustrated in Figure 13, *Wimble* merely discloses a Logical to Physical Manager that is in communication with a single primitive event object and thus performs only one type of mapping. (See Column 10, Lines 43-44) Accordingly, *Wimble* has absolutely no need for a first mapper and a second mapper as recited in Claim 1, and thus *Wimble* clearly provides no teaching,

suggestion, or motivation for the proposed combination. If anything, *Wimble* teaches away from the proposed combination. *Chow* also clearly fails to provide any such teaching, suggestion, or motivation.

For at least these reasons and reasons presented in previous Responses, Applicant respectfully requests reconsideration and allowance of independent Claim 1, together with all of its dependent claims. Independent Claims 9, 13, and 19 recite certain limitations similar to those recited in independent Claim 1 with respect to mapping for heterogeneous types of event producer-consumers.<sup>1</sup> Applicant also respectfully requests reconsideration and allowance of independent Claims 9, 13, and 19, together with all of their dependent claims.

**Independent Claims 23, 34, 45, and 56**

*Chow*, *Wimble*, and even the *Chow-Wimble* combination proposed by the Examiner fail to disclose, teach, or suggest various limitations recited in independent Claim 23.

First, *Chow*, *Wimble*, and the proposed *Chow-Wimble* combination fail to disclose, teach, or suggest “a plurality of event producer-consumers, each event producer-consumer being of a particular type, the plurality of event producer-consumers being of heterogeneous types,” as recited in independent Claim 23.

In the Final Office Action, the Examiner argues that Column 3, Lines 16-24 and Column 6, Lines 51-57 of *Chow* provides such teaching.

As to applicant's argument *Chow* disclosed an event manager object is created for handling events from different environments. Events are registered for the objects. An action is triggered using the event object manager in response to detecting an event occurring in the data processing system, wherein event occurring in an environment are efficiently handled (col. 3, lines 16-24). *Chow* also disclosed the present invention isolates platform specific event recognition in an event management object, also called an event manager. The rest of the system logic or application is coded for logical event generated by the event manager. The event manager is employed to map platform specific events to the platform-independent logical events. As a result, the rest of the system code becomes independent of the platform except for the event manager (col. 6, lines 51-57).

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<sup>1</sup> Applicant does not necessarily agree with the Examiner's statement that Claims 12-13, 18-19, and 22 "have the same limitations" as Claim 1. (Final Office Action, Page 5)

(Final Office Action, Page 11)

Even assuming for the sake of argument that the Examiner's summary of Column 3, Lines 16-24 and Column 6, Lines 51-57 of *Chow* is accurate, that portion of *Chow*, and all other portions of *Chow*, would still fail to disclose, teach, or suggest "a plurality of event producer-consumers, each event producer-consumer being of a particular type, the plurality of event producer-consumers being of heterogeneous types," as recited in independent Claim 23. Thus, *Chow* is wholly inadequate as a reference against Claim 1.

Moreover, *Wimble* fails to make up for the clear deficiencies of *Chow* with respect to independent Claim 23. As discussed above, *Wimble* merely discloses a Logical to Physical Manager that is in communication with a single primitive event object and thus performs only one type of mapping for the single primitive event object. Thus, *Wimble* fails to disclose, teach, or suggest a physical event manager in communication "a plurality of event producer-consumers, each event producer-consumer being of a particular type, the plurality of event producer-consumers being of heterogeneous types," as recited in independent Claim 23. Thus, *Wimble* is also wholly inadequate as a reference against Claim 1.

Consequently, even assuming for the sake of argument that there was the required teaching, suggestion, or motivation to combine *Chow* with *Wimble* in the manner the Examiner proposes, the proposed *Chow-Wimble* combination would still fail to disclose, teach, or suggest "a plurality of event producer-consumers, each event producer-consumer being of a particular type, the plurality of event producer-consumers being of heterogeneous types," as recited in independent Claim 23.

Second, for the reasons discussed above, *Chow*, *Wimble*, and the *Chow-Wimble* combination proposed by the Examiner fail to disclose, teach, or suggest "a plurality of mappers each corresponding to a particular type of event producer-consumer," where each mapper is operable to "translate the particular type of signal received from the corresponding particular type of event producer-consumer into a logical event for communication to the logical event manager" and to "translate the logical event received from the logical event

manager into a particular type of signal indicative of a physical event for communication to the corresponding particular type of event producer-consumer," as recited in independent Claim 23.

Thus, even assuming for the sake of argument that there was the required teaching, suggestion, or motivation to combine *Chow* with *Wimble* as the Examiner proposes, the proposed *Chow-Wimble* combination would still fail to disclose, teach, or suggest the limitations specifically recited in independent Claim 23.

Furthermore, as discussed above, the requisite teaching, suggestion, or motivation in the prior art to combine *Chow* with *Wimble* in the manner the Examiner proposes is entirely lacking.

For at least these reasons and reasons presented in previous Responses, Applicant respectfully requests reconsideration and allowance of independent Claim 23, together with all of its dependent claims. Independent Claims 34, 45, and 56 recite certain limitations similar to those recited in independent Claim 23 with respect to mapping for heterogeneous types of event producer-consumers.<sup>2</sup> Applicant also respectfully requests reconsideration and allowance of independent Claims 34, 45, and 56, together with all of their dependent claims.

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<sup>2</sup> Applicant does not necessarily agree with the Examiner's statements that Claims 32-33, 43-44, and 54-55 "have the same limitations" as Claims 30-31 and that Claim 56 "has the same limitations" as Claim 23. (Final Office Action, Page 9)

**Conclusion**

Applicant has made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicant respectfully requests full allowance of all pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Christopher W. Kennerly, the Attorney for Applicant, at the Examiner's convenience at (214) 953-6812.

Applicant believes that no fees are due. However, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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